

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA

In Re:

Sheldahl, Inc.

Chapter 11

Debtor.

Case No. 02-31674

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RESPONSE OF ARGENBRIGHT SECURITY, INC. TO  
STEERING COMMITTEE'S SECOND OMNIBUS OBJECTION TO CLAIMS

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TO: Those parties specified in Local Rule 9013-3(b).

COMES NOW Argenbright Security, Inc. ("Argenbright") by and through its undersigned counsel, and files this Response to the Steering Committee's Second Omnibus Objection to Claims:

**PROCEDURAL POSTURE**

Argenbright properly filed proof of claim number 66 for \$36,191.55 (hereafter "Claim 66").

The Steering Committee's Second Omnibus Objection to Claims objects to Argenbright's claim as being filed in an amount exceeding the amount listed on debtor's Schedules. The Steering Committee's Second Omnibus Objection to Claims seeks to reduce the claim filed from \$36,191.55 to \$29,253.00.

**ARGUMENT**

Argenbright's claim filed in the amount of \$36,191.55 is valid and should be allowed in

said amount. Attached to Argenbright's claim is supporting documentation including copies of eight invoices totalling \$33,271.00 and copy of Security Services Agreement between debtor and Argenbright. The Security Services Agreement under the paragraph entitled "INVOICES", provides for interest at the rate of 18 percent per annum on invoices not paid within 30 days of invoice date. Attached to the Proof of Claim is a calculation of the balance due as of the date of the filing of debtor's Bankruptcy Petition. Said balance is \$36,191.55, including interest.

The Steering Committee's Second Omnibus Objection to Claims provides no detailed calculation or documentation for the amount for which it seeks reduction of the claim of Argenbright. It does not address the documentation of the claim attached to Argenbright's Proof of Claim and has shown no basis for reduction of the claim other than the fact that debtor's Schedules list the claim in the lower amount.

### **CONCLUSION**

For all the reasons stated above the Steering Committee's Objection to the Claim of Argenbright should be dismissed and Argenbright's Claim Number 66 should be allowed as filed.

### **JOHN A. HALPERN & ASSOCIATES**

Dated: September 30, 2004

By: \_\_\_\_\_



Harold B. Koritz

#57642

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UNSWORN DECLARATION FOR PROOF OF SERVICE

I, Merrilee Johnson, Secretary, in the law firm of John A. Halpern & Associates, 500 Plymouth Building, Minneapolis, Minnesota 55042, declare under penalty of perjury that on September 30, 2004, I served the Response of Argenbright Security, Inc. to Steering Committee's Second Omnibus Objection to Claims on the parties on the attached Service List by sending to those parties as identified on the attached Service List a copy thereof by First Class Mail.

Dated: September 30, 2004

  
MERRILEE JOHNSON

## SERVICE LIST

Sheldahl, Inc. Steering Committee  
c/o Lorie A. Klein, Esq.  
Moss & Barnett, P.A.  
4800 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, MN 55402-4129

James L. Baillie, Esq.  
Fredrickson & Byron  
900 Second Avenue South, Room 1100  
Minneapolis MN 55402

Unsecured Creditors Committee  
James A. Rubenstein, Esq.  
Moss & Barnett, P.A.  
4800 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, MN 55402-4129

Unsecured Creditors Committee  
Alan D. Halperin and Robert Raicht  
Halperin Battaglia Raicht  
555 Madison Avenue, 9<sup>th</sup> Floor  
New York, NY 10022

United States Trustee  
Sarah J. Wencil, Esq.  
1015 US Courthouse  
300 South Fourth Street  
Minneapolis, MN 55415

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September 30, 2004

Clerk of Bankruptcy Court  
301 U.S. Courthouse  
300 South Fourth Street  
Minneapolis, MN 55415

**BY MESSENGER DELIVERY**

**RE: Sheldahl, Inc.  
Bankruptcy Court File No. 02-31674**

Dear Sir or Madam:

Enclosed for filing with your office on disk, in the above-entitled proceeding, please find Response of Argenbright Security, Inc. to Steering Committee's Second Omnibus Objection to Claims and Unsworn Declaration for Proof of Service.

Sincerely yours,

**JOHN A. HALPERN & ASSOCIATES**

Harold B. Koritz

HBK:maj  
Enclosures